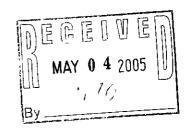


Online Banking www westmiltonstatebank com Telephone Banking 570-568-BANK (2265)





April 28, 2005

Robert E Feldman Executive Secretary Federal Deposit Insurance Corporation 550 7<sup>th</sup> Street, N.W Washington, DC 29429

Re RIN Number 3064-AC89

Dear Mr Feldman:

As the CEO of a \$226 million community bank that employs 60 people, I fully support the proposal to amend the definition of a small institution to be a bank under \$1 billion in assets

My institution is committed to the communities we serve located in Union, Northumberland, and Snyder counties. It is simply the way we do business. Moreover, the current asset size of \$250 million is unrealistic in today's financial landscape and has been in place for many years. It is time for an adjustment.

Community banks are struggling with regulatory compliance. This is an area that can be easily changed to give needed relief without weakening the Community Reinvestment Act and its requirements. We are committed to community reinvestment and in order to survive, thrive and compete, we must meet the needs of the customers and communities we serve. We believe in our community and our customers and want to continue to provide them with quality products and services to meet their needs.

It is unfair that a bank thousands of times larger than my community bank should be examined using the same procedures. I strongly urge you to amend the definition of a small bank for CRA purposes to be an institution with less than \$1 billion in assets, regardless of whether the bank is part of a holding company. This is a good proposal and the right thing to do to help maintain quality community banks

Sincerely,

Donald A. Byerfy President and CEO

**West Milton Office** 

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